

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
NEWARK DIVISION**

JOANNE NEALE, KERI HAY, KELLY  
MCGARY, SVEIN A. BERG,  
GREGORY P. BURNS, DAVID TAFT,  
JEFFREY KRUGER and KAREN  
COLLOPY individually and on behalf of  
others similarly situated,

Plaintiffs,

vs.

VOLVO CARS OF NORTH AMERICA,  
LLC, and VOLVO CAR  
CORPORATION,

Defendants.

No. 2:10-cv-04407-DMC-MF

**CLASS ACTION**

**JURY TRIAL DEMANDED**

**EXHIBIT A – CHART OF DOCUMENTS PLAINTIFFS’  
SEEK TO HAVE SUBMITTED UNDER SEAL**

<b>Document 1</b>	Plaintiff Svein Berg’s Memorandum of Law in Opposition to Defendants’ Motion for Summary Judgment
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties’ agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants’ Objection to Seal?</b>	No.

<b>Document 2</b>	Exhibits to the Certification of Matthew D. Schelkopf in Support of Plaintiff Berg's Opposition to Defendants' Motion for Summary Judgment <ul style="list-style-type: none"> <li>Exhibits 10 and 11: Documents Produced And Bates Stamped By Defendants During Discovery</li> <li>Exhibit 13: Deposition Exhibit Excerpts from the Deposition of Andy McCloskey, dated December 14, 2011</li> </ul>
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 3</b>	Plaintiff Svein Berg's Response and Statement of Undisputed Material Facts in Opposition to Volvo's Motion for Summary Judgment
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 4</b>	Plaintiff Gregory Burns' Memorandum of Law in

	Opposition to Defendants' Motion for Summary Judgment
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 5</b>	Exhibits to the Certification of Matthew D. Schelkopf in Support of Plaintiff Burns' Opposition to Defendants' Motion for Summary Judgment <ul style="list-style-type: none"> <li>Exhibits 9 and 10: Documents Produced And Bates Stamped By Defendants During Discovery</li> <li>Exhibit 12: Deposition Exhibit Excerpts from the Deposition of Andy McCloskey, dated December 14, 2011</li> </ul>
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 6</b>	Plaintiff Gregory Burns' Response and Statement of Undisputed Material Facts in Opposition to Volvo's Motion for Summary Judgment

<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 7</b>	Plaintiff Karen Collopy's Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 8</b>	Exhibits to the Certification of Matthew D. Schelkopf in Support of Plaintiff Collopy's Opposition to Defendants' Motion for Summary Judgment <ul style="list-style-type: none"> <li>Exhibits 8 and 9: Documents Produced And Bates Stamped By Defendants During Discovery</li> <li>Exhibit 11: Deposition Exhibit Excerpts from the Deposition of Andy McCloskey, dated December 14, 2011</li> </ul>
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J.</b>	Yes.

<b>Confidentiality Order</b>	
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 9</b>	Plaintiff Karen Collopy's Response and Statement of Undisputed Material Facts in Opposition to Volvo's Motion for Summary Judgment
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 10</b>	Plaintiff Keri Hay's Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d)</b>	All aspects of this material are confidential.

<b>Unavailability of Less Restrictive Alternative</b>	
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 11</b>	Exhibits to the Certification of Matthew D. Schelkopf in Support of Plaintiff Hay's Opposition to Defendants' Motion for Summary Judgment <ul style="list-style-type: none"> <li>Exhibits 9 and 10: Documents Produced And Bates Stamped By Defendants During Discovery</li> <li>Exhibit 12: Deposition Exhibit Excerpts from the Deposition of Andy McCloskey, dated December 14, 2011</li> </ul>
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 12</b>	Plaintiff Keri Hay's Response and Statement of Undisputed Material Facts in Opposition to Volvo's Motion for Summary Judgment
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability</b>	All aspects of this material are confidential.

<b>of Less Restrictive Alternative</b>	
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 13</b>	Plaintiff Jeffrey Kruger's Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 14</b>	Exhibits to the Certification of Matthew D. Schelkopf in Support of Plaintiff Kruger's Opposition to Defendants' Motion for Summary Judgment <ul style="list-style-type: none"> <li>Exhibits 9 and 10: Documents Produced And Bates Stamped By Defendants During Discovery</li> </ul>
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 15</b>	Plaintiff Jeffrey Kruger's Response and Statement of Undisputed Material Facts in Opposition to Volvo's

	Motion for Summary Judgment
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 16</b>	Plaintiff Kelly McGary's Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 17</b>	Exhibits to the Certification of Matthew D. Schelkopf in Support of Plaintiff McGary's Opposition to Defendants' Motion for Summary Judgment <ul style="list-style-type: none"> <li>• Exhibits 10 and 11: Documents Produced And Bates Stamped By Defendants During Discovery</li> <li>• Exhibit 13: Deposition Exhibit Excerpts from the Deposition of Andy McCloskey, dated December 14, 2011</li> </ul>
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.

<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 18</b>	Plaintiff Kelly McGary's Response and Statement of Undisputed Material Facts in Opposition to Volvo's Motion for Summary Judgment
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 19</b>	Plaintiff Joanne Neale's Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.

<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 20</b>	Exhibits to the Certification of Matthew D. Schelkopf in Support of Plaintiff Neale's Opposition to Defendants' Motion for Summary Judgment <ul style="list-style-type: none"> <li>• Exhibits 10 and 11: Documents Produced And Bates Stamped By Defendants During Discovery</li> <li>• Exhibit 13: Deposition Exhibit Excerpts from the Deposition of Andy McCloskey, dated December 14, 2011</li> </ul>
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 21</b>	Plaintiff Joanne Neale's Response and Statement of Undisputed Material Facts in Opposition to Volvo's Motion for Summary Judgment
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d)</b>	All aspects of this material are confidential.

<b>Unavailability of Less Restrictive Alternative</b>	
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 22</b>	Plaintiff David Taft's Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 23</b>	Exhibits to the Certification of Matthew D. Schelkopf in Support of Plaintiff Taft's Opposition to Defendants' Motion for Summary Judgment <ul style="list-style-type: none"> <li>• Exhibits 13 and 14: Documents Produced And Bates Stamped By Defendants During Discovery</li> <li>• Exhibit 17: Deposition Exhibit Excerpts from the Deposition of Andy McCloskey, dated December 14, 2011</li> </ul>
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive</b>	All aspects of this material are confidential.

<b>Alternative</b>	
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 24</b>	Plaintiff David Taft's Response and Statement of Undisputed Material Facts in Opposition to Volvo's Motion for Summary Judgment
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.
<b>Document 25</b>	Certification of Charles E. Benedict, Ph.D., P.E. In Support of Plaintiffs' Motion for Class Certification.
<b>Disclosed to Public?</b>	No. The parties agreed to keep this material confidential.
<b>Subject to D.N.J. Confidentiality Order</b>	Yes.
<b>L.Civ.R. 5.3(C) factors</b>	
<b>(c)(2)(b) Public or Private Interests Protected</b>	Protects the parties' agreement to keep this material confidential.
<b>(c)(2)(c) Clearly Defined Serious Injury</b>	Disclosure would divulge confidential Volvo internal information.
<b>(c)(2)(d) Unavailability of Less Restrictive Alternative</b>	All aspects of this material are confidential.
<b>Defendants' Objection to Seal?</b>	No.

Dated: August 24, 2012

Respectfully submitted,

By: //s// Matthew D. Schelkopf  
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